IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	Nikolai Grigoriev	Examiner: Rachna Singh
Serial No.:	09/699,572	Group Art Unit: 2176
Filed:	October 30, 2000	Docket: 1571.001US2
Title:	Methods for Rendering Tables	

REPLY BRIEF UNDER 37 CFR § 41.41

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

This Reply is presented in response to the Examiner's Answer, dated March 20, 2007, which was sent in answer to Appellant's Appeal Brief, filed on December 1, 2006.

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REPLY

Applicants respectfully continue to disagree with the Examiner's application of the Chatterjee reference in view of Applicants' pending independent claims and their corresponding limitations.

Specifically, The Examiner contends that the Chatterjee reference teaches a "synchronization marker" via the record synchronization value discussed in Chatterjee. The passage recited by the Examiner is in column 18 lines 36-51 and Figure 2. This synchronization value is used to indicate that two different versions are synchronized with each other. *See* FIG. 6A item number 155; FIG. 7 item number 174; and column 18 lines 36-39; column 21 lines 4-10.

So, when two entirely different version of a record are meant to be synchronized and represented as one; this is reflected in the synchronization value. See column 22 lines 6-20. The Examiner has not asserted that the version number is a synchronization marker in this case; rather, the assertion is that the synchronization value is Applicants' claimed "synchronization marker."

The claims recite, inter alia, "a number of cells which have a same synchronization marker are processed together as an independent group, and wherein at least two different cells have the same synchronization marker, and wherein the cells are processed in a sequential order defined by their corresponding synchronization marker to render the grid." *Emphasis added.* The Examiner appears to assert with respect to this limitation that the version number is a synchronization marker because the cited passages of Chatterjee being relied upon by the examiner for this teaching does not discuss any synchronization value and only discusses organizing records in a hierarchy. See column 13 lines 15-42 and column 14 lines 54-67. The last passage recited by the Examiner in column 14 lines 54-67 discusses versioning an entire table based on state hierarchy. Clearly, a table is not single celled as the Examiner asserts may be the case with a record having one field. A table would not be a table with one cell.

Applicant respectfully asserts that in order to find the teachings in Chatterjee the Examiner has to interpret some teachings one way and other teachings another way and the multiple interpretations are not in fact consistent with one another. In other words, in one

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instance it is asserted that the synchronization marker is the synchronization value and in another instance it is asserted to be the version number and processing order is asserted to be associated with an entire table and not cells or even records. In fact, the last paragraph of page 13 asserts that the versioning is done on a per table bases. Records with for a particular version on duplicated in the hierarchy under the version of the table to which they relate. *See* column 13 lines 31-35.

There is no indication anywhere in Chatterjee that multiple records from different versions are processed in a sequential order to produce a composite version of a table in response to a synchronization marker. The limitation: "cells are processed in a sequential order defined by their corresponding synchronization marker to render the grid" is still missing even given the inconsistent and incapable interpretations of the teachings of Chatterjee provided by the Examiner. At best, the hierarchy produces a table for a specific version and there is no need for any sequential processing order in this scenario. There is no illustration or teaching where records from the hierarchy are processed across versions in response to a synchronization marker.

Therefore, Applicants continue to respectfully disagree with the rationale and application of the Chatterjee reference and respectfully request that the rejections be withdrawn and the claims of record allowed.

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Additionally, the Rao reference is focused on presentation of primary data and Chatterjee is focused on creation or maintenance of primary data. Applicants continue to fail to see how a common sense approach can be used to properly combine these references because what the Examiner is proposing is that techniques used to create primary data be used or would have been used in techniques used to render primary data. The focus of the industry has been exactly the opposite where the two approaches have been consciously separated and not mixed. Thus, as a practical and common sense approach Applicants do not believe these references are combinable as the Examiner asserts.

Respectfully submitted,

NIKOLAI GRIGORIEV

By his Representatives,

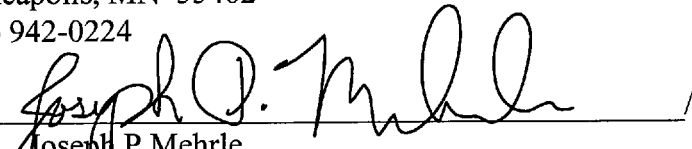SCHWEGMAN, LUNDBERG, WOESSNER & KLUTH, P.A.
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